

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE PHARMACEUTICAL INDUSTRY)
AVERAGE WHOLESale PRICE)
LITIGATION)
_____)

MDL NO. 1456
Civil Action No. 01-12257-PBS

THIS DOCUMENT RELATES TO:)
)
)

International Union of Operating)
Engineers, Local No. 68 Welfare)
Fund v. AstraZeneca PLC at al.)
)
_____)

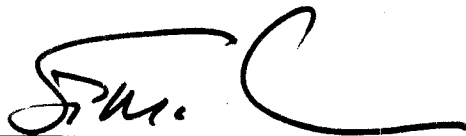
Civil Action No. 04-11503-PBS

**DEFENDANT NOVARTIS PHARMACEUTICALS CORPORATION'S
CERTIFICATION PURSUANT TO LOCAL RULE 16.1(D)(3)**

Pursuant to Local Rule 16.1(D)(3), defendant Novartis Pharmaceuticals Corporation, and its undersigned attorneys, hereby certify that they have conferred with a view to establishing a budget for the costs of conducting the full course, and various alternative courses, for the captioned litigation, and have conferred to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

Dated: April 6, 2005

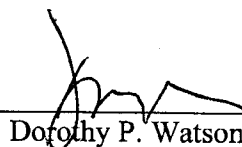
By its attorneys:



Jane W. Parver
Saul P. Morgenstern
KAYE SCHOLER LLP
425 Park Avenue
New York, New York 10022
Tel: (212) 836-8000
Fax: (212) 836-8689

NOVARTIS PHARMACEUTICALS CORPORATION

By



Dorothy P. Watson
Vice President and General Counsel
One Health Plaza, Building 403
59 Route 10
East Hanover, New Jersey 07936-1080

Certificate of Service

I, Benjamin M. Stern, certify that pursuant to Court Management Order No. 2, I caused a copy of the foregoing document to be posted on Verilaw for electronic service to counsel of record in this action on this 7th day of April 2005.

/s/ Benjamin M. Stern

Benjamin M. Stern